

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND, SOUTHERN DIVISION**

**Walter Black  
individually and on behalf of all  
others similarly situated,**

**Plaintiff,**

**vs.**

**USAA General Indemnity  
Company, et al.,**

**Defendants.**

**Case No. 8:21-cv-1581-PJM**

**AGREED MOTION FOR EXTENSION OF TIME**

For the reasons set forth below, Plaintiff respectfully moves this Court, pursuant to Local Rule 105(9), for an order extending the current deadlines set forth in the Joint Report Under Rule 26(f) (Dkt. 77) and entered by this Honorable Court's Memorandum Order of July 23, 2024 (Dkt. 78) by 60 days. All Parties consent to this motion.

1. On or about July 18, 2024, the Parties filed a Joint Report Under Rule 26(f) that included a detailed scheduling order that set forth a schedule and deadlines for the completion of discovery and other case management needs. By Memorandum Order, this Honorable Court entered the scheduling order on July 23, 2024.

2. Since the entry of the Court's Memorandum Order, the Parties have been diligently working on discovery in this matter including exchange of written discovery as well as discovery geared towards efforts in preparation of the mediation that occurred on November 7, 2024, with the Honorable Benson Legg (Retired). While a resolution was not reached on November 7, 2024, efforts towards resolution continue. The Parties intend to exchange additional information and

continue engagement with Judge Legg to try and resolve this matter.

3. The Parties continue to work though on-going discovery issues as this matter encompasses a rather large time frame, dating back to 2011 with certain documents not readily available to Defendants. This and other discovery challenges may delay the deposition dates and case management needs that the scheduling order currently has set.

4. Therefore, to allow for sufficient time for the Parties to continue the mediation process and if unsuccessful, complete discovery and all case management issues, the parties agree that an extension of all deadlines set forth in the scheduling order is warranted. The Parties believe that a 60 day extension will be sufficient for these purposes.

WHEREFORE, for the foregoing reasons, the Plaintiff respectfully requests that this Court grant this Motion and extend all deadlines set forth in the Scheduling Order, described herein, by 60 days.

Dated: November 15, 2024

Respectfully submitted,

/s/ Jonathan P. Kagan

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